

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

**WAG ACQUISITION, L.L.C.,**

Plaintiff,

v.

**SOBONITO INVESTMENTS, LTD.,  
COOLVISION LTD., I.M.L. SLU,  
and DOES 1-20 INVESTMENTS,**

Defendant.

Civil Action No.: 2:14-CV-01661-ES-JAD

**REQUEST FOR INTERNATIONAL JUDICIAL ASSISTANCE (LETTER ROGATORY)**

The United States District Court for the District of New Jersey presents its greetings to the appropriate judicial authority of Andorra, and requests international judicial assistance to effect service of process to be used in a civil proceeding before this court in the above captioned matter.

This Court requests the assistance described herein as necessary in the interests of justice. This Court requests that the appropriate judicial authority of Andorra effect service of judicial documents, in accordance with the laws of Andorra for service of such documents, upon the below named entity at the following address:

I.M.L. SLU  
("Imlive")  
Edifici Burges, Avinguda Sant Antoni 27  
La Massana, AD 400  
Principat D'Andorra

The judicial documents to be served are listed as follows: Complaint for Patent Infringement, including Exhibit A and Exhibit B; Summons in a Civil Case; Form AO120; Plaintiff WAG Acquisition, L.L.C.'s Corporate Disclosure Statement; and First Amended Complaint for Patent Infringement.

This Court also requests that the appropriate judicial authority of Andorra require and cause the appropriate person or authority to complete and sign the attached Certificate of Service of Judicial Documents. This Court also requests that the appropriate judicial authority of Andorra sign and/or affix his or her seal (or stamp) to the completed Certificate if satisfied that service of the judicial documents was properly effected under the laws of Andorra and that, under the procedure followed, a knowingly false statement on the certificate would subject the person or authority who completed it to criminal penalty under the laws of Andorra.

This Request for Judicial Assistance is brought by the Plaintiff, WAG Acquisitions, L.L.C. The Plaintiff's allegations in the action pending before the Court issuing this request concern infringement of four (4) U.S. patents: United States Patent Nos. 8,122,141, 8,327,011, 8,185,611, and 8,364,839. The Plaintiff alleges that the Andorran company, I.M.L. SLU, is the proprietor of a number of Internet sites, including the site imlive.com, which distribute live streaming video programs from computer servers physically located in the United States, and that this is done in a manner that infringes the aforementioned U.S. patents. The Plaintiff requests a judgment from the Court issuing this request, for the following: Declaration that Defendants have each infringed United States Patent Nos. 8,122,141 8,327,011, 8,185,611, and 8,364,839; Declaration that each of the Defendants' infringement has been willful; Permanently enjoining Defendants from continued infringement; Awarding damages together with

prejudgment and post-judgment interest, in an amount according to proof; Awarding attorneys' fees, costs, or other damages pursuant to 35 U.S.C. § 284 or § 285.

This Request is made in accordance with the following federal rules and statutes:


Fed. R. Civ. P. 4(f)  
28 U.S.C. § 1331  
28 U.S.C. § 1338(a)  
28 U.S.C. § 1391(b)-(c)  
28 U.S.C. § 1400(b)  
35 U.S.C. § 1 *et seq.*  
35 U.S.C. § 271 (a)-(b)  
35 U.S.C. § 284  
35 U.S.C. § 285

This Court states that it shall provide similar assistance to the appropriate Judicial Authority of Andorra.

This Court states that it shall compel the Plaintiff to reimburse Andorra for the expenses it incurs in the execution of this International Judicial Assistance (Letter Rogatory).

This 10<sup>th</sup> day of September 2014.

Seal of the Court

  
Hon. Joseph A. Dickson  
United States Magistrate Judge

United States District Court  
District of New Jersey

**CERTIFICATE OF SERVICE OF JUDICIAL DOCUMENTS**

I, the undersigned, \_\_\_\_\_, with the understanding that I am subject to criminal penalty under the laws of Andorra for an intentionally false declaration, declare that:

1. The following judicial documents were served on I.M.L. SLU:
  - a. Complaint for Patent Infringement, including Exhibit A and Exhibit B;
  - b. Summons in a Civil Case;
  - c. Form AO120;
  - d. Plaintiff WAG Acquisition, L.L.C.'s Corporate Disclosure Statement;
  - e. First Amended Complaint for Patent Infringement
2. These judicial documents were served in accordance with the laws of Andorra by delivering them at the following date and location:

Date: \_\_\_\_\_

Location (place, street, number): \_\_\_\_\_

Person (identity and description of person receiving documents on behalf of I.M.L. SLU):  
\_\_\_\_\_

Relationship to I.M.L. SLU (owner, director, manager, or other employee):  
\_\_\_\_\_

Date of execution: \_\_\_\_\_

Place of execution: \_\_\_\_\_

Signature: \_\_\_\_\_